

CR 23-201 JW/LIB

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

v.

18 U.S.C. § 2253(b)

21 U.S.C. § 853(p)

STEPHAN JEREMIAH HANSEN,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

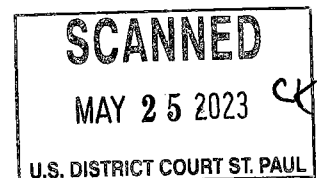
COUNTS 1-4

(Production and Attempted Production of Child Pornography)

On or about the dates set forth below, in the State and District of Minnesota, the
defendant,

STEPHAN JEREMIAH HANSEN,

did employ, use, persuade, induce, and entice, and attempt to employ, use, persuade,
induce, and entice known minors to engage in sexually explicit conduct for the purpose of
producing a visual depiction of such conduct, as described below, which visual depiction
was produced and attempted to be produced using materials that had been mailed, shipped,
and transported in interstate and foreign commerce by any means, including by computer,
to wit:



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COUNT	DATE	FILE NAME	DESCRIPTION OF FILE
1	10/31/2015	IMG_6474.JPG	An image depicting two naked girls leaning back on a couch with their genitals exposed.
2	10/31/2015	IMG_6461.JPG	An image depicting a naked girl leaning back on a couch with her legs raised toward her shoulders, exposing her genitals and buttocks.
3	1/16/2016	IMG_6985.JPG	An image depicting a naked girl lying on her back with her legs open and her genitals exposed.
4	1/16/2016	IMG_6984.JPG	A close-up image depicting the genitals of a naked girl, with an adult hand spreading her labia.

all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Counts 1-4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

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(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including an iPhone 11 Pro Max in a black case, seized from the defendant on March 23, 2022, and the following property seized from the defendant on July 6, 2022: one red HP ProBook laptop, and one blue Samsung S22 Ultra cellular device in a blue case.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON